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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE’S MOTION TO REMOVE
FORMER PARTIES IN INTEREST FROM THE MASTER SERVICE LIST AND FOR A
PROCEDURE TO EFFECT FUTURE UPDATES TO THE MASTER SERVICE LIST**

Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC (the “Trustee”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On March 3, 2017, the Trustee filed the Trustee's Motion to Remove Former Parties in Interest from the Master Service List and for a Procedure to Effect Future Updates to the Master Service List (the "Motion") (ECF No. 15128) and the Declaration of Vineet Sehgal in Support of the Trustee's Motion to Remove Former Parties in Interest from the Master Service List and for a Procedure to Effect Future Updates to the Master Service List (the "Sehgal Declaration") (ECF No. 15133).

2. The deadline for filing objections to the Motion expired on March 16, 2017 at 4:00 p.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) all Former Parties In Interest listed on Exhibit 1 annexed to the Sehgal Declaration; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel for the Trustee has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon.

5. In response to the Motion, the Trustee received requests from two (2) individuals identified in the Motion who asked to remain on the Master Service List. As such, the Trustee has removed those individuals from the Motion.

6. An electronic copy of a proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion, along with an updated Exhibit A and Exhibit B thereto, will be submitted to the Court, along with this certificate.

7. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing, but notes that the Former Parties In Interest are both *pro se* and represented by counsel.

Dated: New York, New York
March 27, 2017

By: /s/ David J. Sheehan
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